

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW HAMPSHIRE**

In re:

**SHEPHERDS HILL DEVELOPMENT
CO. LLC,**

Debtor.

**Chapter 11
Case No. 99-11087**

**SHEPHERDS HILL HOMEOWNERS ASSOCIATION, INC.’S
SUPPLEMENTAL REQUEST FOR RELIEF**

Pursuant to this Court’s Order issued September 27, 2021, Shepherds Hill Homeowners Association, Inc. (the “Association”), an interested party, submits the following supplemental request for relief in connection with its Motion for Determination, which motion is incorporated herein by reference.

The Association requests that this Honorable Court grant its Motion for Determination and enter an order:

- A. Determining that if any Shepherds Hill Condominium units are added to the Condominium and sold, such sales shall not be encumbered by the Plan Obligations;
- B. Determining that the Association is not bound by the terms of the Plan, Confirmation order or NPA;
- C. Determine that neither the Plan, Confirmation Order, nor NPA operates as a lien on the Condominium land or lien on the condominium Development Right; and
- D. Grant such other and further relief as may be necessary, just, and proper.

Respectfully submitted,

DATED: October 18, 2021

SHEPHERDS HILL HOMEOWNERS
ASSOCIATION, INC.,

By its attorneys,

/s/ Jesse I. Redlener

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CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of October 2021, I filed the foregoing document *via* the Court's CM/ECF electronic filing system ("CM/ECF"), which sent notice to all parties receiving notification through CM/ECF.

/s/Jesse I. Redlener

Jesse I. Redlener